

Exhibit 12

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

VLSI TECHNOLOGY LLC,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 18-966 (CFC)
)	
INTEL CORPORATION,)	
)	
Defendant.)	

INTEL CORPORATION'S SUPPLEMENTAL INITIAL DISCLOSURES

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December 20, 2018

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Attorneys for Defendant

Pursuant to Federal Rule of Civil Procedure 26(a)(1), Defendant Intel Corporation (“Intel”) hereby supplements its initial disclosures to Plaintiff VLSI Technology LLC (“VLSI”).

These supplemental disclosures represent Intel’s current knowledge regarding information relevant to the disputed facts alleged in the pleadings and are based on Intel’s ongoing investigation into VLSI’s current allegations. By making these supplemental disclosures, Intel does not represent that it is identifying every document, item of electronically stored information, tangible thing, or witness that might be relevant to the claims and defenses asserted in this action. Rather, Intel’s supplemental disclosures represent a good faith effort to identify information that Intel reasonably believes at this time to be relevant to its defenses. Intel reserves the right to clarify, alter, amend, modify, or supplement the information contained in these supplemental disclosures if and when additional information becomes available.

Intel provides these supplemental disclosures subject to and without waiving any applicable privilege, doctrine, or right, including without limitation the attorney-client privilege, work-product protection, or any other applicable privilege or immunity recognized under the laws of the United States, the State of California, and all relevant jurisdictions. Furthermore, Intel makes these supplemental disclosures without waiving any of its rights, including, but not limited to: (1) the right to object to the relevance or admissibility of the information disclosed; (2) the right to object to the use of any disclosed information for any purpose, in whole or in part, in any subsequent proceeding in this action or in any other action; and (3) the right to object on proper grounds to any discovery request relating to the subject matter of these disclosures.

Intel reserves the right to amend or supplement these supplemental disclosures and to present additional evidence to support its claims and defenses with any filing or during any proceeding in this action, including at trial.

The supplemental disclosures set forth below are made subject to the above objections and qualifications.

A. Individuals Likely to Have Discoverable Information

Based upon information reasonably available to Intel at the present time, the following individuals and/or entities are likely to have discoverable information that Intel may use to support its claims, defenses, or counterclaims in this action (unless solely for impeachment). Intel's investigation for discoverable information that it may use to support its claims or defenses in this litigation is ongoing, and Intel reserves the right to supplement information as necessary. VLSI should contact any current Intel employee, agent, or representative only through Intel's counsel of record.

Name, Address, and Telephone Number	Connection to Case	Relevant Subject Matter
Nadav Shulman [Contact through counsel of record for Intel]	Principal Engineer	Design, development, structure, and function of certain voltage adjustment features of certain accused Intel products
Efraim Rotem [Contact through counsel of record for Intel]	Principal Engineer	Design, development, structure, and function of certain voltage adjustment features and certain power gate features of certain accused Intel products
Steve Gunther [Contact through counsel of record for Intel]	Principal Engineer	Design, development, structure, and function of certain voltage adjustment features of certain accused Intel products
Sanjeev Jahagirdar [Contact through counsel of record for Intel]	Principal Engineer	Design, development, structure, and function of certain voltage adjustment features of certain accused Intel products
Varghese George [Contact through counsel of record for Intel]	Principal Engineer	Design, development, structure, and function of

Name, Address, and Telephone Number	Connection to Case	Relevant Subject Matter
record for Intel]		certain voltage adjustment features of certain accused Intel products
Arun Krishnamoorthy [Contact through counsel of record for Intel]	Senior Principal Engineer	Design, development, structure, and function of certain voltage adjustment features of certain accused Intel products
Sridhar Lakshmanamurthy [Contact through counsel of record for Intel]	Senior Principal Engineer	Design, development, structure, and function of Intel's On-Chip System Fabric
Robert Adler [Contact through counsel of record for Intel]	Senior Principal Engineer	Design, development, structure, and function of Intel's On-Chip System Fabric Sideband interface
Robert Hesse [Contact through counsel of record for Intel]	SoC Architect	Design, development, structure, and function of Intel's On-Chip System Fabric Sideband interface
Mikal Hunsaker [Contact through counsel of record for Intel]	Senior Principal Engineer	Design, development, structure, and function of Intel's On-Chip System Fabric
Xiaoyu Ruan [Contact through counsel of record for Intel]	Software Architect	Design, development, structure, and function of ME firmware architecture of certain accused Intel products
William Stevens [Contact through counsel of record for Intel]	Chief Architect	Design, development, structure, and function of ME firmware architecture of certain accused Intel products
Khee Wooi Lee [Contact through counsel of record for Intel]	Principal Engineer, Chipset Hardware Architect	Design, development, structure, and function of ME hardware architecture of certain accused Intel products
Moonsoo Kang [Contact through counsel of record for Intel]	Group Leader	Design, development, structure, and function of certain metal dummy line features of certain accused Intel products
Michael Zelikson [Contact through counsel of record for Intel]	Principal Engineer	Design, development, structure, and function of certain power gate features of

Name, Address, and Telephone Number	Connection to Case	Relevant Subject Matter
		certain accused Intel products
Ioannis Schoinas [Contact through counsel of record for Intel]	Senior Principal Engineer	Design, development, structure, and function of certain security architecture features implemented by Intel's On-Chip System Fabric
Steven Dennison [Contact through counsel of record for Intel]	Software Architect	Design, development, structure, and function of the SAI bits and access policy registers used for implementing the security architecture in certain accused Intel products
Thripathi Hedge [Contact through counsel of record for Intel]	Security Architect	Design, development, structure, and function of the SAI bits and access policy registers used for implementing the security architecture in certain accused Intel products
Malay Trivedi [Contact through counsel of record for Intel]	Principal Engineer	Design, development, structure, and function of the SAI bits and access policy registers used for implementing the security architecture in certain accused Intel products
Thomas Herrgott [Contact through counsel of record for Intel]	Controller	Sales of the accused Intel products
Keith Gray [Contact through counsel of record for Intel]	Associate Director, Patent Licensing Group	Intel patent licensing
Paul S. Levy [Current address unknown]	Named inventor of U.S. Patent No. 6,212,633	Alleged inventions claimed in U.S. Patent No. 6,212,633
Steve Cornelius [Current address unknown]	Named inventor of U.S. Patent No. 6,212,633	Alleged inventions claimed in U.S. Patent No. 6,212,633
Marcus W. May [Current address unknown]	Named inventor of U.S. Patent No. 7,246,027	Alleged inventions claimed in U.S. Patent No. 7,246,027
Matthew D. Felder [Current address unknown]	Named inventor of U.S. Patent No. 7,246,027	Alleged inventions claimed in U.S. Patent No. 7,246,027
Scott K. Pozder [Current address unknown]	Named inventor of U.S. Patent No. 7,247,552	Alleged inventions claimed in U.S. Patent No. 7,247,552

Name, Address, and Telephone Number	Connection to Case	Relevant Subject Matter
Kevin J. Hess [Current address unknown]	Named inventor of U.S. Patent No. 7,247,552	Alleged inventions claimed in U.S. Patent No. 7,247,552
Pak K. Leung [Current address unknown]	Named inventor of U.S. Patent No. 7,247,552	Alleged inventions claimed in U.S. Patent No. 7,247,552
Edward O. Travis [Current address unknown]	Named inventor of U.S. Patent No. 7,247,552	Alleged inventions claimed in U.S. Patent No. 7,247,552
Bret P. Wilkerson [Current address unknown]	Named inventor of U.S. Patent No. 7,247,552	Alleged inventions claimed in U.S. Patent No. 7,247,552
David G. Wontor [Current address unknown]	Named inventor of U.S. Patent No. 7,247,552	Alleged inventions claimed in U.S. Patent No. 7,247,552
Jie-Hua-Zhao [Current address unknown]	Named inventor of U.S. Patent No. 7,247,552	Alleged inventions claimed in U.S. Patent No. 7,247,552
Gerardius Wilhelmus Theodorus Van Der Heijden [Current address unknown]	Named inventor of U.S. Patent No. 7,523,331	Alleged inventions claimed in U.S. Patent No. 7,523,331
Sergey Sofer [Current address unknown]	Named inventor of U.S. Patent No. 8,081,026	Alleged inventions claimed in U.S. Patent No. 8,081,026
Eyal Melamed-Kohen [Current address unknown]	Named inventor of U.S. Patent No. 8,081,026	Alleged inventions claimed in U.S. Patent No. 8,081,026
Valery Neiman [Current address unknown]	Named inventor of U.S. Patent No. 8,081,026	Alleged inventions claimed in U.S. Patent No. 8,081,026
Michael Stolarski	CEO, VLSI	VLSI's business, the patents-in-suit, VLSI's acquisition of the patents-in-suit, the alleged value of the patents-in-suit, any alleged damages VLSI claims to have suffered, and related topics and technology
Eran Zur	Managing Director of Intellectual Property Finance Group, Fortress Investment Group	VLSI's acquisition of the patents-in-suit
CF VLSI Holdings, LLC	Interested third party	Ownership of the patents-in-suit, the alleged value of the patents-in-suit
VLSI Technology, Inc.	Former assignee of U.S. Patent No. 6,212,633	Ownership, conception, reduction to practice, costs of development or products purportedly practicing, and licensing of U.S. Patent No. 6,212,633
Philips Semiconductors VLSI Inc.	Former assignee of U.S. Patent No. 6,212,633	Ownership, conception, reduction to practice, costs of

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		development or products purportedly practicing, and licensing of U.S. Patent No. 6,212,633
Philips Semiconductors Inc.	Former assignee of U.S. Patent No. 6,212,633	Ownership, conception, reduction to practice, costs of development or products purportedly practicing, and licensing of U.S. Patent No. 6,212,633
Koninklijke Philips Electronics N.V.	Former assignee of U.S. Patent Nos. 6,212,633; 7,523,331	Ownership, conception, reduction to practice, costs of development or products purportedly practicing, and licensing of U.S. Patent No. 6,212,633
Philips Semiconductors International B.V.	Former assignee of U.S. Patent No. 6,212,633	Ownership, conception, reduction to practice, costs of development or products purportedly practicing, and licensing of U.S. Patent No. 6,212,633
NXP B.V.	Former assignee of U.S. Patent Nos. 6,212,633; 7,523,331	Ownership, conception, reduction to practice, costs of development or products purportedly practicing, and licensing of U.S. Patent No. 6,212,633
Sigmatel, Inc.	Former assignee of U.S. Patent No. 7,246,027	Ownership, conception, reduction to practice, costs of development or products purportedly practicing, and licensing of U.S. Patent No. 7,246,027
Sigmatel, LLC	Former assignee of U.S. Patent No. 7,246,027	Ownership, conception, reduction to practice, costs of development or products purportedly practicing, and licensing of U.S. Patent No. 7,246,027
NXP B.V.	Former assignee of U.S. Patent Nos. 7,246,027; 8,081,026	Ownership, conception, reduction to practice, costs of development or products purportedly practicing, and

Name, Address, and Telephone Number	Connection to Case	Relevant Subject Matter
		licensing of U.S. Patent No. 7,246,027
Freescale Semiconductor, Inc.	Former assignee of U.S. Patent Nos. 7,247,552; 8,081,026	Ownership, conception, reduction to practice, costs of development or products purportedly practicing, and licensing of U.S. Patent No. 7,247,522
Eric Scheurlein 626 Jefferson Avenue Suite 7 Redwood City, CA 94063 [As represented to the Patent Office during prosecution]	Prosecution counsel for the patents-in-suit	Prosecution and ownership of the patents-in-suit
Scott A. Stinebruner Wood, Herron & Evans L.L.P. 2700 Carew Tower 441 Vine Street Cincinnati, OH 45202	Former prosecution counsel for U.S. Patent No. 6,212,633	Prosecution and ownership of U.S. Patent No. 6,212,633
Kevin L. Smith Garlick Harrison & Markison P.O. Box 160727 Austin, TX 78716 [As represented to the Patent Office during prosecution]	Former prosecution counsel for U.S. Patent No. 7,246,027	Prosecution and ownership of U.S. Patent No. 7,246,027
Robert L. King Freescale Semiconductor, Inc. Law Department 7700 West Larmer Lane MD:TX32/PL02 Austin, TX 78729 [As represented to the Patent Office during prosecution]	Former prosecution counsel for U.S. Patent No. 7,247,552	Prosecution and ownership of U.S. Patent No. 7,247,552
James L. Clingan, Jr. 10705 Watering Rock Lane Austin, TX 78759-5569 [according to the State Bar of Texas]	Former prosecution counsel for U.S. Patent No. 7,247,552	Prosecution and ownership of U.S. Patent No. 7,247,552
David Barnes Philips Intellectual Property & Standards P.O. Box 3001	Former prosecution counsel for U.S. Patent No. 7,523,331	Prosecution and ownership of U.S. Patent No. 7,523,331

Name, Address, and Telephone Number	Connection to Case	Relevant Subject Matter
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NXP Intellectual Property Department M/S41-SJ 1109 McKay Drive San Jose, CA 95131	Former prosecution counsel for U.S. Patent No. 7,523,331	Prosecution and ownership of U.S. Patent No. 7,523,331
Mark A. Wilson Wilson & Ham PMB: 348 2530 Berryessa Road San Jose, CA 95312	Former prosecution counsel for U.S. Patent No. 7,523,331	Prosecution and ownership of U.S. Patent No. 7,523,331
Gustav Larson Larson Neman, LLP 5914 West Courtyard Drive Suite 200 Austin, TX 78730	Former prosecution counsel for U.S. Patent No. 8,081,026	Prosecution and ownership of U.S. Patent No. 8,081,026
David Dolezal Freescale Semiconductor, Inc. Law Department 7700 West Larmer Lane MD:TX32/PL02 Austin, TX 78729 [As represented to the Patent Office during prosecution]	Former prosecution counsel for U.S. Patent No. 8,081,026	Prosecution and ownership of U.S. Patent No. 8,081,026

In addition, Intel identifies the following persons who may have information relevant to Intel's claims or defenses:

- One or more VLSI witnesses with knowledge of VLSI's business, the patents-in-suit, VLSI's acquisition of the patents-in-suit, the alleged value of the patents-in-suit, any alleged damages VLSI claims to have suffered, and related topics and technology;
- One or more witnesses at NXP, B.V., NXP USA, Inc., Freescale Semiconductor, Inc. Fortress Investments, LLC, CF VLSI Holdings, LLC, and/or their successors or affiliated companies with knowledge regarding the licensing, acquisition, transfer, and covenants relating to, as well as the conception and reduction to practice of, the patents-in-suit;
- All authors and inventors of any prior art reference(s) identified and produced in this action;

- Persons deposed during this litigation and persons identified during such depositions;
- Any custodian of records or other person who may be required to establish authenticity of documents; and
- Any person identified in VLSI's Initial Disclosures.

Intel does not consent to or authorize communication by VLSI with any of Intel's current or officers, employees, attorneys, agents, or consultants. All current Intel employees, agents, and representatives should be contacted through Intel's attorneys of record.

Intel reserves the right to clarify, alter, amend, modify, or supplement the foregoing list and to seek discovery from or relating to persons that may subsequently be identified as likely to have discoverable information relevant to the disputed facts, as additional information becomes known. Intel also reserves the right to designate and/or call further witnesses at trial, including witnesses designated by VLSI in its initial disclosures or called by VLSI at trial.

Intel will identify any testifying expert witnesses as required by Rule 26(a)(2) and any applicable Local Rule or order of the Court.

B. Description of Documents

Based on the information reasonably available to Intel at the present time, Intel identifies the following documents, electronically stored information, and tangible things in its possession, custody, or control that it may use to support its claims and defenses (unless solely for impeachment):

- Documents sufficient to show the design, development, structure, and function of the accused Intel products;
- Documents sufficient to show financial, sales, and marketing information relating to those accused products;
- The file histories of the patents-in-suit;

- Licenses to the patents-in-suit;
- Documents relating to licenses of patents for technology comparable to the technology claimed in the patents-in-suit; and
- Prior art to the patents-in-suit.

The documents listed above, if in existence and in Intel's possession, are located and/or accessible at Intel's offices, including its facilities in Santa Clara, California, Hillsboro, Oregon, and Haifa, Israel.

Intel reserves the right to object to the production of documents on any basis, including that the information sought: (1) is not relevant; (2) is protected from disclosure by an applicable privilege, doctrine, or immunity; (3) would be unduly burdensome or expensive to produce; (4) is not proportional to the needs of the case; (5) contains third-party confidential information and cannot be produced without that party's notification and consent; or (6) constitutes proprietary or trade secret information that should not be produced before an appropriate protective order has been entered.

Intel's investigation for discoverable information that it may use to support its claims or defenses in this litigation is ongoing. Intel may also rely on publicly available documents and documents that are produced by any party to this litigation—including Intel, VLSI, and third parties. Intel also expects that experts may identify documents used to support their opinions pertaining to the issues in this case during the course of expert discovery.

C. Computation of Damages

Intel reserves its right to seek its attorneys' fees and costs and other relief as is deemed appropriate. These fees and costs and amount of any other relief that may be deemed appropriate are not susceptible to calculation at this time.

D. Insurance Agreement

Intel is currently unaware of any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in this action or to indemnify or reimburse Intel for payments made to satisfy such a judgment.

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/s/ Jeremy A. Tigan

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December 20, 2018

CERTIFICATE OF SERVICE

I hereby certify that on December, 2018, copies of the foregoing were caused to be served upon the following in the manner indicated:

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